

## **Remarks**

1. The Examiner's reconsideration of the application is urged in view of the amendments above and the arguments given below.

2. Claims 1-15 have been cancelled and a new set of claims 16-32 introduced.

Generally, in the new set of claims, the word "pixel(s)" is replaced by "cell(s)" in order to avoid any confusion between the "cells" of a display device (commonly also designated pixels) and the "pixels" constituting an image. This replacement is based on the specification, page 8, lines 6-8. In the new set of claims, the words "matrix display" are replaced by "matrix display device". This replacement is done in order to clearly indicate that a display device is meant and not a displayed image.

The following correspondence exists between the new claims 16-32 and cancelled claims 1-15:

claim 16 corresponds to claim 1 without the "copy"-alternative;

claims 17-22 correspond to claims 3-8, respectively;

claim 23 corresponds to the "copy" alternative in claim 1;

claim 24 corresponds to claim 2;

claim 25 corresponds to claim 9, without the "copy" alternative;

claims 26-30 correspond to claims 10-14, respectively;

claim 31 corresponds to the "copy" alternative of claim 9 and

claim 32 corresponds to claim 15.

3. In the Office Action, page 2, point 3, claims 11, 14 and 15 were objected to because of formalities.

Periods are added at the end of claims 27 (=claim 11) and 30 (=claim 14) and claim 32 (=claim 15) has been completed.

4. Claim Rejections – 35 USC § 112

In the Office Action, page 3, point 5, claims 2, 5 and 12 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

The claims depended on a claim (claim 1 and claim 9 respectively) which contains an option and in this way they were asserted to be indefinite.

In new independent claims 16 and 25 this option has been removed so that the dependent claims are no longer indefinite.

5. Claim Rejections -35 USC § 102

In the Office Action, page 4, point 7, claims 1, 3-4, 8-11 and 15 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Murakami (US 5,982,946).

New claim 16 (previously claim 1) describes a method for avoiding misinterpretation of an image displayed on a matrix display device due to defective cells in the matrix display device, the method comprising:

obtaining information on the presence and the location of the defective cells in said matrix display device, and

on the basis of this information,

modulating the operation of said matrix display device so as to indicate, emphasize or warn for the presence of said defective cells on the actual display of said image, or adapting the image content of the defective cells or of cells in the neighborhood of the defective pixels so, as to indicate, emphasize or warn for the presence of said defective cells in a copy of said image.

The claimed method provides a particular indication on the display device in the neighborhood of defective cells of this display device so that a user immediately can see that, on the indicated position, one or more cells are defective. This particular indication is independent of the image displayed.

Murakami discloses a method for identifying and correcting defective pixels in a digital image (col. 3, lines 24-28) so that, when the image is displayed after correction, it is difficult or impossible to detect the defects of the image (col. 9, lines 29-31: "Consequently, the correction is made in a way to suppress incongruity and to minimize texture deterioration in the digital image.")

The following features of claim 16 are not disclosed by Murakami:

- there are no defective cells of a display device in Murakami but Murakami discusses defective pixels in a digital image;
- because Murakami does not discuss defective cells, obtaining information on the presence and location of defective cells also is not disclosed in Murakami;
- Murakami does not disclose a modulation of the operation of the display device for indicating, emphasizing or warning for the presence of defective cells.

New claim 16 is thus not anticipated by Murakami.

The features of new claim 16 are also not disclosed in the other cited prior art. New claim 16 is thus submitted to be novel over the prior art.

New claim 16 is also non-obvious over Murakami and the other cited prior art.

First of all, the method disclosed in Murakami belongs to the technical area of image processing (correcting and modifying images) while the method of new claim 16 belongs to the technology of display devices (screens) and discloses a way of handling defects in such a display device.

Secondly, there is also no analogy between the method of Murakami and the method of claim 16. The method according to Murakami comprises:

- identification by an operator of a defective pixel in a digital image;
- displaying, superposed on the digital image, a rectangular frame (col. 15, lines 27-37 and Fig.6, ER); this rectangular frame ER, also called

evaluation area, delimits on the screen the area reserved for certain calculations (e.g. interpolation) in order to get a corrected value for the defective pixel.

In Murakami, there is no further need to indicate, emphasize or warn for the presence of defective pixels because the defective pixels will be corrected. Thus, new claim 16 is therefore also non-obvious over the prior art and new claim 16 is therefore submitted to be allowable.

New claims 25 (previously first option of claim 9) and claim 32 (previously claim 15) are independent claims containing all the features of new claim 16. These claims are thus also novel and non-obvious over the prior art and are also submitted to be allowable.

New claims 17, 18, 22, 26 and 27 (previously claims 3, 4, 8, 10 and 11 respectively) are all claims dependent on allowable claims; they are thus also submitted to be allowable.

In order to be complete, the feature of claim 17 (= claim 3) is not disclosed in Murakami; in Murakami the presence and location of a defective pixel is detected by an operator (col. 15: 9-12). The same is true regarding the feature of claim 18 (=claim 4).

Regarding the feature of claim 22 (=claim 8): in Murakami, defective pixels are due to errors in the scanning device, which does not mean that the information on the presence of the defective pixels is obtained by an image capturing device, but which means only that the defective pixels are created by the image capturing device.

#### 6. Claim Rejections 35 USC § 103

In the Office Action, page 7, point 10, claims 6-7 and 13-14 were rejected under 35 U.S.C. 103(a) as being unpatentable over Murakami (US 5,982,946) in view of Johson et al. (US 2004/0164939).

New claims 20, 21, 29 and 30 correspond to claims on file 6, 7, 13 and 14, respectively.

New claims 20, 21, 29 and 30 are all claims that are dependent on claims which are now considered to be allowable. The new claims are thus also submitted to be allowable.

7. New claims 23, 24 and 31.

New claim 23 describes a method for avoiding misinterpretation of a copy of an image displayed on a matrix display device due to defective cells in the matrix display device, the method comprising:

obtaining information on the presence and the location of the defective cells in said matrix display device, and

on the basis of this information,

adapting the image content of the defective cells or of cells in the neighborhood of the defective cells so, as to indicate, emphasize or warn for the presence of said defective cells in the copy of said image.

No prior art has been cited disclosing particular features relating to the misinterpretation of a copy of an image, displayed on a display device having defective cells. New claim 23 is thus novel and non-obvious over the prior art. For this reason, new claim 23 is submitted to be allowable.

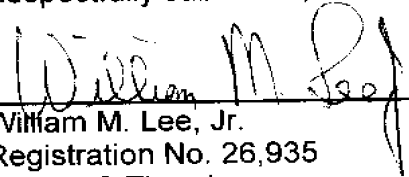
The same reasoning can be applied to new claim 31.

Claim 24 being a claim depending on an allowable claim, claim 24 is also submitted to be allowable.

8. Given the above, it is submitted that the application is now in condition for allowance, and the Examiner's further and favorable reconsideration in that regard is urged.

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Respectfully submitted,

A handwritten signature in dark ink, appearing to read "William M. Lee, Jr.", is written over a horizontal line.

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